

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

ESI/EMPLOYEE SOLUTIONS, LP;
HAGAN LAW GROUP LLC; and
STATE OF TEXAS,

Plaintiffs,

V.

CITY OF DALLAS; T.C. BROADNAX, in his official capacity as City Manager of the City of Dallas; and BEVERLY DAVIS, in her official capacity as Director of the City of Dallas Office of Equity and Human Rights,

Defendants.

NO. 4:19-cv-00570-ALM

TEXAS'S JOINDER IN MOTION FOR PRELIMINARY INJUNCTION

On July 30, 2019, Plaintiffs ESI/Employee Solutions, LP and Hagan Law Group LLC filed a Motion for Preliminary Injunction. Dkt. 3. On August 6, 2019, Plaintiffs filed an Amended Complaint in which the State of Texas joined this lawsuit as a Plaintiff. Dkt. 9. Plaintiff Texas joins the motion for preliminary injunction on preemption grounds and requests that the Court grant the motion. Texas adopts and incorporates by reference Plaintiffs' arguments concerning preemption as if fully set forth herein. Texas further adopts and incorporates by reference the arguments set forth in its Brief in Support of Motion for Preliminary Injunction and Request for Declaratory and Injunctive Relief, also filed on this date, as if fully set forth herein.

CONCLUSION

Texas respectfully requests that the Court grant the motion for a preliminary injunction and issue the injunction without delay.

Respectfully submitted this 20th day of August, 2019.

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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2019, this document was filed via the Court's CM/ECF system, causing electronic service upon all counsel of record.

/s/ Michael Toth
MICHAEL TOTH
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